

DARREN J. LACH, ESQ.

Nevada Bar No. 09606

LACH INJURY LAW

8870 S. Maryland Pkwy., Suite 135

Las Vegas, Nevada 89123

Telephone: (702) 505-4758

Facsimile: (702) 505-4768

E-mail: service@lachinjurylaw.com

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LOUELLA POOL, an individual,

Plaintiff,

v.

SMITH'S FOOD AND DRUG CENTERS, INC., a foreign corporation; NICHOLAS SHOOP, an individual; DOE STORE MANAGER I through V; DOE STORE EMPLOYEE I through V; DOE & ROE EMPLOYERS; DOE OWNERS I through V; ROE OWNERS I through V; and ROE COMPANIES I through V, inclusive,

Defendants.

Case No.: 2:22-cv-00255-JCM-DJA

**STIPULATION TO EXTEND TIME TO
FILE OPPOSITION (First Request)**

COME NOW, Plaintiff LOUELLA POOL (hereinafter "Plaintiff"), by and through her counsel of record, DARREN J. LACH, ESQ. of LACH INJURY LAW, and Defendants SMITH'S FOOD AND DRUG CENTERS, INC. and NICHOLAS SCHOOOP (hereinafter "Defendants"), by and through their counsel of record, ANDRE T. MARQUES, ESQ. and JERRY S. BUSBY, ESQ. of the law firm COOPER LEVENSON, P.A., and hereby stipulate that Plaintiff may have an extension to March 7, 2022, to file a response and/or opposition to Defendant NICHOLAS SHOOP'S Motion to Dismiss Plaintiff's Complaint. Defendant SHOOP'S Motion to Dismiss Plaintiff's Complaint was filed on

1 February 14, 2022, with Plaintiff's Response and/or Opposition currently due on February 28, 2022.

2 Due to the recent holiday and Plaintiff's counsel having a family emergency with a person in the ICU,
3 the parties stipulate to allow Plaintiff to file a response and/or opposition to Defendant's Motion to
4 Dismiss by March 7, 2022.

5
6
7 DATED this 25th day of February, 2022.

8 By: /s/ Darren J. Lach
9 **DARREN J. LACH, ESQ.**
10 Nevada Bar No. 09606
11 **LACH INJURY LAW**
12 8870 S. Maryland Pkwy., Suite 135
13 Las Vegas, Nevada 89123
14 *Attorney for Plaintiff*

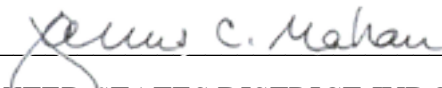
DATED this 25th day of February, 2022.

By: /s/ Andre T. Marques
JERRY S. BUSBY, ESQ.
Nevada Bar No. 01107
ANDRE T. MARQUES, ESQ.
Nevada Bar No. 014737
COOPER LEVENSON, P.A.
3016 West Charleston Blvd. - #195
Las Vegas, Nevada 89102
Attorneys for Defendants

ORDER

15 IT IS SO ORDERED.

16 Dated March 1, 2022.

17
18 
19 UNITED STATES DISTRICT JUDGE

Subject: RE: Pool v. Smith's re SAO to Extend Opp due date
Date: Friday, February 25, 2022 at 2:15:03 PM Pacific Standard Time
From: Marques Andre
To: Darren Lach, Kraemer, Gregory A.
CC: Ganniny, Rutkowski Theresa H.
Attachments: image001.png

You may affix my e-signature.

Thanks,
Andre

[Click here to sign up for the latest Cooper Levenson news.](#)

Andre T. Marques, Esq.
Cooper Levenson, P.A., Attorneys at Law
3016 W. Charleston Blvd., Suite 195
Las Vegas, NV 89102
Direct Dial (702) 366-1125, ext. 1908
Direct Fax (702) 366-1857
E-Mail: amarques@cooperlevenson.com
URL: <http://www.cooperlevenson.com>

Cooper Levenson, P.A.

New Jersey / Delaware / Nevada / Florida / New York



Please consider the environment before printing this email.



ATTENTION: This E-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the Individual(s) named above. If you are not the intended recipient of this E-mail, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this E-mail is strictly prohibited. If you have received this E-mail in error, please immediately notify us by telephone at (609)344-3161 or notify us by E-mail at administrator@cooperlevenson.com. Although Cooper Levenson Law Firm attempts to sweep e-mail and attachments for viruses, it does not guarantee that either are virus-free and accepts no liability for any damage sustained as a result of viruses.

From: Darren Lach [<mailto:darren@lachinjurylaw.com>]
Sent: Thursday, February 24, 2022 2:41 PM
To: Marques Andre; Kraemer, Gregory A.